

From: [Eagle, Venus](#)
To: [Kimberlee Young](#)
Cc: [Rossi, Lois](#); [Laws, Meredith](#)
Subject: RE: Letter and Labeling from Dr. Steven Bradbury for Neonicotinoid Products
Date: Friday, August 30, 2013 10:38:00 AM

Hi Kimberlee,

The tree injection products (e.g. EPA Reg. Nos. 69117-1 and 69117-8) are not subject to the agency's August 15, 2013 pollinator language. Please let me know if you have any further questions.

Regards,
Venus

From: Kimberlee Young [mailto:kim@regwest.com]
Sent: Thursday, August 29, 2013 7:15 PM
To: Eagle, Venus
Cc: Rossi, Lois
Subject: FW: Letter and Labeling from Dr. Steven Bradbury for Neonicotinoid Products

Hello Venus,

I understand Meredith is out of the office until September 4, 2013; her away message said to contact you in her absence. Would either you or Lois be able to answer my question below prior to Meredith's return?

Regards,

Kimberlee Young (formerly: Kim Davis),
Consultant/Agent
RegWest Company, LLC
8203 West 20th St., Suite A
Greeley, CO 80634-4696
970.353.0611 (office)
970.381.5853 (cell)
970.353.0613 (fax)

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From: Kimberlee Young
Sent: Thursday, August 29, 2013 5:11 PM
To: 'Laws, Meredith'
Cc: Chip Doolittle (chip@arborsystems.com); Mike Frisina (mike@arborsystems.com)
Subject: RE: Letter and Labeling from Dr. Steven Bradbury for Neonicotinoid Products

Hello Meredith,

I just finished reviewing the August 15, 2013 letter and have one question.

Background: RegWest's client, ArborSystems, has two Imidacloprid products (EPA Reg. Nos. 69117-1 and 69117-8); the first is applied via a closed system injection apparatus that injects the chemical directly into the

cambial area of the tree; the other product is applied to trees in a similar manner (to the cambial area of the tree) using a syringe (a drill is used to create the injection hole for the syringe application).

The Letter states:

- "The EPA has completed its assessment of what new labeling terms are necessary on all products registered for outdoor foliar use." (Paragraph 2 of Section I)
- "This letter applies to all products (FIFRA Section 3 and 24(c) Special Local Need registrations) that have outdoor foliar use directions (except granulars) containing the active ingredients . . ." (Paragraph 1 of Section II)

The required label language includes:

- "Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills."
- ". . . planned application so that the bees can be removed, covered or otherwise protected prior to spraying." (three places)

[Emphasis added]

Question: Since ArborSystems' products are not for outdoor foliar use or applied as a foliar spray are they exempt from the requirements of this Pollinator Protection program?

Please let me know if you need additional information to answer this question.

Regards,

Kimberlee Young (formerly: Kim Davis),
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From: Laws, Meredith [<mailto:Laws.Meredith@epa.gov>]

Sent: Thursday, August 15, 2013 7:49 AM

Subject: Letter and Labeling from Dr. Steven Bradbury for Neonicotinoid Products

Dear Registrants & Agents:

This is a follow-up to the July 22, 2013 letter from Dr. Steven Bradbury, Director of EPA's Office of Pesticide Programs. Please read the attached letter and note the two additional documents that comprise labeling for your products, as discussed in the letter.

Please acknowledge receipt of this email within 48 hours.

Thank you,

Meredith Laws
Chief, Insecticide-Rodenticide Branch

Registration Division
Office of Pesticide Programs
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www.epa.gov/pesticides